

Testimony of Walter Tsou, MD, MPH
Executive Director of Physicians for Social Responsibility Philadelphia. July 17, 2018

My name is Dr. Walter Tsou. I serve as Executive Director of Philadelphia Physicians for Social Responsibility and a past president of the American Public Health Association. Thank you for the opportunity to testify on "Strengthening Transparency in Regulatory Science". As many of my colleagues have noted today, while the goal of transparency in how studies are conducted and the ability to reproduce scientific results are important, it can offer a politically motivated Administration a convenient excuse for eliminating or ignoring scientific studies that may go against the wishes of a powerful industry group. All one has to do is demand the data sets be handed over for "further scrutiny" or demand that the study be repeated before basing a regulation on the study in question.

The very nature of longitudinal public health studies where health and toxins intersect are by design, large, expensive and require years or decades before results are found. Sample sizes can often number in the tens of thousands to millions of data points and may need to be collected over many years before a statistically significant finding is identified. For example, Curry, et al studied in Pennsylvania babies who lived within 1 kilometer of active fracking wells. She had to review over 1.1 million birth records before demonstrating the relationship between living close to gas wells and low birth weight babies. Because these studies are so big, they are often too expensive to repeat. In our state of Pennsylvania, scientific research on fracking is actively stymied or suppressed. In a state where billions are made on gas drilling, only one part time contractor at the Health Department collects data on health complaints from fracking. Those who do have health complaints have to sign non-disclosure agreements and not cooperate with any research in order to get life saving water to drink. This extortion practice is common in the industry in order to suppress any health studies on the dangers of fracking. If the transparency regulation was in place, all health studies on fracking would be simply not considered because the research could not be conducted due to non disclosure agreements.

Today there is no reputable scientist that doesn't believe in the harmful effects of smoking. The health studies on smoking were 15 years in the making before the Surgeon General released his landmark report. And except for a handful of EPA administrators, there is no reputable scientist who doesn't believe that climate change is real and is man made. The studies on climate change and health have been known since Exxon wrote about it in 1977. If these transparency rules were in place when the EPA was founded, smoking would still be in airplanes and no one would have heard of "greenhouse gases" or "global warming", the greatest threat to our planet's existence.

Since the founding of the EPA, independent scientific research has been the foundational basis of your mission. Science is the cross before the corporate devil. This transparency rule would destroy the confidential nature of research and make the burden of conducting research more difficult and expensive. Finally, the real purpose of these rules is to reverse regulations on industries who have been harmful to public health. We should let science speak the truth and the EPA should hear from all scientific studies, not just the ones the industry wants you to listen to. Thank you.